

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROSLYN HARRIS, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

PFIZER INC.,

Defendant.

Civil Action No. 1:21-cv-06789

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that pursuant to Rules 12(b)(1), 12(b)(6) and 9(b) of the Federal Rules of Civil Procedure, and upon the accompanying Memorandum of Law and Declaration of Colleen M. Gulliver and the exhibits attached thereto, Defendant Pfizer Inc. (“Pfizer”), through its undersigned counsel, moves to dismiss all claims asserted against Pfizer in Plaintiff Roslyn Harris’s (“Plaintiff’s”) Complaint (“Complaint”), filed on August 12, 2021. Pfizer will move this Court, before Denise L. Cote, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by this Court, for an Order granting Defendant’s Motion to Dismiss Plaintiff’s Complaint in its entirety with prejudice.

Dated: October 21, 2021

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Loren H. Brown

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